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January 4, 1993

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Mr. Prabhakar Kasarabada  
Project Manager  
Indiana Department of  
Environmental Control  
5500 W. Bradbury Ave.  
Indianapolis, Indiana 46241

RE: Main Street Well Field Site  
Elkhart, Indiana

Dear Sir and Madams:

This is a submission of Trinity Industries, Inc., ("Trinity") one of the West Side 106 Order Respondents in the matter of Main Street Well Field, Elkhart, Indiana. Trinity understands from speaking with Reed Oslin, counsel for Miles, that EPA is reluctant to settle this case for a significant discount. Perhaps other potentially responsible parties ("PRP's") should be joined under the Order. Moreover, under 42 U.S.C. § 9613(K)(2)(D) EPA has a mandatory duty to notify these PRP's. Trinity submits the following information on other PRP's which may help clear this impasse:

1. Shell Oil Co. - Major user and believed to be a supplier of Stoddard solvents. Misleading interrogatory answers by Shell to EPA dealt with the wrong address for Shell's bulk oil plant in Elkhart.

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2. Yoder Oil Co. - Sam Lyle of City Water Department tracked them as major source of contamination. Dale Crussemeyer corroborates Yoder's bulk oil facility spills.
3. Bru-Bec-Sto - Found dumping TCE on ground by numerous people. Dissolved in 1989. EPA should investigate corporate officers on this matter.
4. Babcock & Wilcox - Known major user of TCE. Indemnified Trinity (current owner) for all environmental harm on Trinity's property.
5. CTS Corp. - Known spills of TCE in large quantities. Uses Stoddard solvents in business operations.
6. Duane Noble - Hoosier Cleaners - Numerous witnesses to intentional dumping of Stoddard solvents by Hoosier. Noble, former owner and officer, lives in Paradise Valley, Arizona.
7. Himco - Dumped TCE in pond behind Falcone's Tavern. Formerly part of White's Gravel Pit.
8. Tecumseh Products - Used TCE. Believed to be user of Stoddard solvents. Major use of Stoddard solvents are (1) cleaning metal prior to coating or painting; (2) high pressure hoses; (3) dry cleaning (now illegal); and (4) testing purity of bulk oil shipments. Tecumseh is believed to be involved in both of the first two categories.

Please do not hesitate to give me a call with any questions or comments you may have regarding this matter, or should you need further information.

Very truly yours,

LOCKE PURNELL RAIN HARRELL  
(A Professional Corporation)

By:   
Frederick W. Addison, III

FWA:kp